

## IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

## Report Of Investigation

Page 1 Of 3

<b>INVESTIGATION DATE</b>		<b>FROM:</b> (Use Stamp) Region No. 6 P. O. Box 27 Washington, Iowa 52353
Current 4/9/82	Last	
<b>TO: (Facility Name, Location &amp; Address)</b> Eagle Signal Industrial Controls Attention: L. Trefftz, Plt. Eng. 736 Federal Street Davenport, Iowa 52803		<b>Persons Contacted (Name &amp; Position)</b> Lane Trefftz, Plant Engineer Arlee Tripaldi, Maintenance Supervisor
<b>RE: (Specify Investigation Purpose Or Cite Rule)</b> Verification - Small Generator Status		

**OBSERVATIONS/RECOMMENDATIONS**

[On March 18, 1982, DEQ Central Office requested inspection of Eagle Signal Industrial Controls, Davenport, Iowa to verify "small generator status".

On April 9, 1982, DEQ Region 6 staff conducted a hazardous waste inspection at Eagle Signal to provide verification. Report of this investigation follows.]

General Information

Eagle Signal Industrial Controls, division of Gulf & Western, is located at 736 Federal St. (off River Drive) in Davenport, Ia. Eagle Signal manufactures electro mechanical and solid state industrial timers and controls. Facilities include 230,000 Ft<sup>2</sup> of manufacturing and office space. Total employment is 300.

Unit operations include machining, painting, plating, and assembly activities. Current production is close to 200,000 units per year.

Hazardous Wastes Generated (from 1982 Annual Report)

Hazardous wastes generated \* at Eagle Signal include:

266 lbs/yr	Freon (F001)
415 lbs/yr	Silk screen solvent (F005)
1827 lbs/yr	Methylene chloride (F009)
290 lbs/yr	Ferric chloride (F009)
620 lbs/yr	Stoddard solvent (D001)
1990 lbs/yr	Coil varnish (D001)
1660 lbs/yr	Organic flux (D001)
415 lbs/yr	Xylene (U239)
166 lbs/yr	Paint and paint sludge (F017)
910 lbs/yr	Plating bath solution (F007)



R00307786  
RCRA RECORDS CENTER

Total 8559 lbs/yr or 713 lbs/mo.

\*[Quantities reflect amounts of hazardous wastes generated each year and do not include

<b>SUSPENSE DATE</b>  1/1	<b>Signature</b>		<b>Date</b>
	Inspector Merritt Van Lier		April 15, 1982
	Regional Administrator Earl C. Voelker, Sr.		
<b>Enclosures (Specify)</b>		4-22-82	
<b>Distribution: Regional Office: (Central Office: Inspected Facility :EPA: Date Copy Mailed: 4/28/82</b>			



# IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

SANITARY LANDFILL INSPECTION ☐

WATER SUPPLY INSPECTION ☐

WASTEWATER TREATMENT FACILITY INSPECTION ☐

AIR QUALITY INSPECTION ☐

HAZARDOUS WASTE INSPECTION ☒

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ITEM CODE	COMMENTS AND RECOMMENDATIONS
	<p>wastes which were in prior storage from previous years of operation.]</p> <p>Wastes are currently generated at less than 2200 lbs/mo (1000 kg/mo), one criteria for "small generator" status.</p> <p>Mr. Lane Trefftz, Plant Engineer, commented that Eagle Signal had originally applied for "interim status" as a conservative measure to comply with RCRA requirements. At that time, 65 drums containing mixed wastes were in storage at the Davenport plant, awaiting landfill disposal. Wastes were subsequently analyzed and shipped to Sheffield, Illinois on May 12, 1981.</p> <p>At the time of this inspection, only seven hazardous waste drums remained in storage (west of the manufacturing addition building at the east end of a company owned parking lot). Drums had been in storage for greater than 90 days, however. Company personnel indicated it was difficult to arrange for transporter pickups of small drum quantities of wastes. Usually containers are left to accumulate for a year prior to shipment. <u>In order to meet small generator requirements, drums must be removed from plant premises within 90 days of accumulation.*</u></p> <p><u>Waiver of Interim Status Requirements</u></p> <p>Interim status requirements including waste analyses plan, security, inspection procedures, personnel training, preparedness/prevention/emergency procedures, waste accountability, closure, and container storage were reviewed with the plant engineer.</p> <p>Some deficiencies were noted such as lack of warning signs around drum storage area, improper labeling of hazardous waste drums, absence of accumulation dates, no inspection program, etc. Eagle had, however, developed and implemented a personnel training program, emergency contingency plan, closure plans and costs, and were aware of hazardous waste manifest requirements.</p> <p>Since Eagle Signal has applied and apparently qualified for "small generator" status, through EPA (per J. Humeston, DEQ CO, 4/15/82), the company is <u>not</u> required to correct the above noted deficiencies. It should be noted, however, that hazardous waste generation must remain below 1000kg/mo and drums used for storage must be removed within 90 days of accumulation to retain this classification. *(Accumulation date begins when 2200 lbs. of waste is collected.)</p>



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	<p><u>Disposal of Hazardous Wastes in Iowa Landfills</u></p> <p>40 CFR 261.5(d)(3) [See Federal Register/Vol. 45, No. 98/Monday, May 19, 1980/pg. 33120] allows small generators to dispose of wastes in "..... a disposal facility..... which is permitted, licensed, or registered by a State to manage municipal or industrial solid waste". The Iowa Department of Environmental Quality requires small generators to first apply for a Special Waste Authorization (SWA) Permit prior to disposal at a local landfill.</p> <p>Eagle Signal may contact Mr. Gene Evans, DEQ CO (515/281-8912) to make necessary arrangements. This should substantially reduce disposal costs and add convenience to daily manufacturing operations.</p> <p>This report and recommendations contained therein, is subject to further reivew and comments by DEQ, Central Office.</p>



5/29/86

1 Have reviewed the Eagle Signal File

1. THEY OPERATED AS STORAGE PRIOR NOV 19, 1980
2. FILED PART A ~~NOV 1980~~
3. THEY CONTINUED TO OPERATE AS A STORAGE FACILITY

ADMINISTRATIVE RECORD PUBLIC NOTICED

MARCH 11 - APRIL 26/86

CONTAINED AMENDED CLOSURE PLAN

} ANY  
PUBLIC  
COMMENTS?

SUGGEST APPROVE CLOSURE PLAN  
WITH POSSIBLE REQUIREMENT TO TEST  
IF ANY CONTAMINATION REMAINS  
ALSO CERTIFY NO SPILL RESULTED FROM ~~THE~~ NEUTRALIZATION  
OF CORROSIVE WASTES DURING CLOSURE  
ASK FOR CERTIFICATION FROM P.E., U.I.

REMOVE FROM DATA BASE ~~AND~~ AND  
CHANGE STATUS TO SQG

PROOF OF PUBLIC NOTICE?

Km